



May 12, 2021

The Honorable Ronnie Abrams
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Blitz v BLDG Mgt Co. Inc., 20-cv-5462 (RA) (RWL)

Dear Judge Abrams,

NYLAG represents plaintiff Richard Blitz for the limited purpose of settlement. I write with the consent of all parties to request an eight-week stay of the litigation until July 8, 2021 and the adjournment of all pending deadlines, with the parties to provide a joint status report no later than July 7, 2021. This is the parties' first joint request for this action.

On May 11, 2021, a settlement conference was held before Magistrate Judge Richard W. Lehrburger. Following this session, Judge Lehrburger issued an Order directing the parties to take certain steps, agreed to at the conference, in furtherance of settlement efforts. (ECF 50) In addition, the Order states that the parties may request from Your Honor "a stay of the litigation for eight weeks so that the parties can focus their resources on finding a resolution." (ECF 50) We respectfully make that request.

The parties made preliminary progress during the settlement conference and agreed to continue diligent settlement negotiations. In addition, Judge Lehrburger scheduled a second settlement conference for June 24, 2021. Given each party's intention to pursue an amicable resolution and NYLAG's limited scope settlement representation, we would like the opportunity to focus our attention on settlement before also commencing pre-trial matters. Further, if negotiations break down, we will not delay to immediately notify the Court.

Respectfully submitted,

Susanne Keane

Susanne Toes Keane

Application granted. This action shall be stayed and all pending deadlines adjourned sine die. The parties shall file a joint status report no later than July 7, 2021.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Ronnie Abrams", with a long horizontal flourish extending to the right.

Ronnie Abrams, U.S.D.J.

May 13, 2021